

# **EXHIBIT “A”**

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Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- 280 ZELNORM
- 285 STRYKER TRIDENT HIP IMPLANTS
- 288 PRUDENTIAL TORT LITIGATION
- 289 REGLAN

- 290 POMPTON LAKES ENVIRONMENTAL LITIGATION
- 291 PELVIC MESH/GYNECARE
- 292 PELVIC MESH/BARD
- 293 DEPUY ASR HIP IMPLANT LITIGATION

**Mass Tort (Track IV)**

- 248 CIBA GEIGY
- 266 HORMONE REPLACEMENT THERAPY (HRT)
- 271 ACCUTANE/ISOTRETINOIN
- 274 RISPERDAL/SEROQUEL/ZYPREXA
- 278 ZOMETA/AREIDIA
- 279 GADOLINIUM

- 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL
- 282 FOSAMAX
- 284 NUVARING
- 286 LEVAQUIN
- 287 YAZ/YASMIN/OCELLA
- 601 ASBESTOS

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category

☐

Putative Class Action

☐

Title 59

## Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

<b>ATLANTIC COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION, DIRECT FILING 1201 BACHARACH BLVD., FIRST FL ATLANTIC CITY, NJ 08401- <b>LAWYERS REFERRAL:</b> (609)345-3444 <b>LEGAL SERVICES:</b> (609)348-4200	<b>BERGEN COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION, ROOM 115 JUSTICE CENTER, 10 MAIN STREET HACKENSACK, NJ 07601 <b>LAWYERS REFERRAL:</b> (201)488-0044 <b>LEGAL SERVICES:</b> (201)487-2166	<b>BURLINGTON COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CENTRAL PROCESSING OFFICE ATTN: JUDICIAL INTAKE FIRST FL, COURTS FACILITY 49 RANCOCAS ROAD MOUNT HOLLY, NJ 08060 <b>LAWYERS REFERRAL:</b> (609)261-4862 <b>LEGAL SERVICES:</b> (800)496-4570
<b>CAMDEN COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL PROCESSING OFFICE HALL OF JUSTICE 1 <sup>ST</sup> FLOOR, SUITE 150 101 SOUTH 5 <sup>TH</sup> STREET CAMDEN, NJ 08103 <b>LAWYERS REFERRAL:</b> (856)964-4520 <b>LEGAL SERVICES:</b> (856)964-2010	<b>CAPE MAY COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT 9 N. MAIN STREET CAPEMAY COURTHOUSE, NJ 08210 <b>LAWYERS REFERRAL:</b> (609)463-0313 <b>LEGAL SERVICES:</b> (609)465-3001	<b>CUMBERLAND COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL CASE MANAGEMENT OFFICE 60 WEST BROAD STREET P.O. BOX 10 BRIDGETON, NJ 08302 <b>LAWYERS REFERRAL:</b> (856)696-5550 <b>LEGAL SERVICES:</b> (856)691-0494
<b>ESSEX COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL CUSTOMER SERVICE HALL OF RECORDS, ROOM 201 465 DR. MARTIN LUTHER KING JR. BLVD. NEWARK, NJ 07102 <b>LAWYERS REFERRAL:</b> (856)482-0618 <b>LEGAL SERVICES:</b> (973)624-4500	<b>GLOUCESTER COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL CASE MANAGEMENT OFFICE ATTN: INTAKE FIRST FLOOR, COURT HOUSE 1 NORTH BROAD STREET WOODBURY, NJ 08096 <b>LAWYERS REFERRAL:</b> (856)848-4589 <b>LEGAL SERVICES:</b> (856)848-5360	<b>HUDSON COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT SUPERIOR COURT, CIVIL RECORDS DEPT. BRENNAN COURT HOUSE, 1 <sup>ST</sup> FLOOR 583 NEWARK AVENUE JERSEY CITY <b>LAWYERS REFERRAL:</b> (201)798-2727 <b>LEGAL SERVICES:</b> (201)792-6363
<b>HUNTERDON COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION 65 PARK AVENUE FLEMINGTON, NJ 08822 <b>LAWYERS REFERRAL:</b> (908)735-2611 <b>LEGAL SERVICES:</b> (908)782-7979	<b>MERCER COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT LOCAL FILING OFFICE, COURTHOUSE 175 S. BROAD STREET, P.O. BOX 8068 TRENTON, NJ 08650 <b>LAWYERS REFERRAL:</b> (609)585-6200 <b>LEGAL SERVICES:</b> (609)695-6249	<b>MIDDLESEX COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT MIDDLESEX VICINAGE 2 <sup>ND</sup> FLOOR- TOWER 56 PATERSON STREET, P.O. BOX 2633 NEW BRUNSWICK, NJ 08903 <b>LAWYERS REFERRAL:</b> (732)828-0053 <b>LEGAL SERVICES:</b> (732)249-7600
<b>MONMOUTH COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT COURT HOUSE P.O. BOX 1269 FREEHOLD, NJ 07728 <b>LAWYERS REFERRAL:</b> (732)431-5544 <b>LEGAL SERVICES:</b> (732)866-0020	<b>MORRIS COUNTY:</b> MORRIS COUNTY COURTHOUSE CIVIL DIVISION WASHINGTON AND COURTS STREETS P.O. BOX 910 MORRISTOWN, NJ 07963 <b>LAWYERS REFERRAL:</b> (973)267-5882 <b>LEGAL SERVICES:</b> (973)285-6911	<b>OCEAN COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT 118 WASHINGTON STREET, ROOM 121 P.O. BOX 2191 TOMS RIVER, NJ 08754 <b>LAWYERS REFERRAL:</b> (732)240-3666 <b>LEGAL SERVICES:</b> (732)341-2727
<b>PASSAIC COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION COURT HOUSE 77 HAMILTON STREET PATERSON, NJ 07505 <b>LAWYERS REFERRAL:</b> (973)278-9223 <b>LEGAL SERVICES:</b> (973)523-2900	<b>SALEM COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT ATTN: CIVIL CASE MANAGEMENT OFFICE 92 MARKET STREET SALEM, NJ 08079 <b>LAWYERS REFERRAL:</b> (856)678-8363 <b>LEGAL SERVICES:</b> (856)451-0003	<b>SOMERSET COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION P.O. BOX 3000 40 NORTH BRIDGE STREET SOMERVILLE, NJ 08876 <b>LAWYERS REFERRAL:</b> (908)685-2323 <b>LEGAL SERVICES:</b> (908)231-0840
<b>SUSSEX COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT SUSSEX COUNTY JUDICIAL CENTER 43-47 HIGH STREET NEWTON, NJ 07860 <b>LAWYERS REFERRAL:</b> (973)267-5882 <b>LEGAL SERVICES:</b> (973)383-7400	<b>UNION COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT 1 <sup>ST</sup> FL, COURT HOUSE 2 BROAD STREET ELIZABETH, NJ 07207 <b>LAWYERS REFERRAL:</b> (908)353-4715 <b>LEGAL SERVICES:</b> (908)354-4340	<b>WARREN COUNTY:</b> DEPUTY CLERK OF THE SUPERIOR COURT CIVIL DIVISION OFFICE 413 SECOND STREET BELVIDERE, NJ 07823 <b>LAWYERS REFERRAL:</b> (973)267-5882 <b>LEGAL SERVICES:</b> (908)475-2010

**FILED**

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SUPERIOR COURT OF NJ  
MERCER COUNTY  
CIVIL DIVISION

**STARK & STARK**  
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Attorneys for Plaintiff  
By: Christopher M. Pyne, Esquire

SEAN J. McCALL

Plaintiff

vs.

NEW PRIME, INC. a/k/a and d/b/a PRIME, INC.,  
JEFFREY SCHOTTMULLER, MONTRESE LAVONNE-  
CARTER and JOHN DOES 1-50 (fictitious designations)

Defendants

SUPERIOR COURT  
OF NEW JERSEY

MERCER COUNTY  
LAW DIVISION

Docket No. L-638-12

CIVIL ACTION

COMPLAINT AND  
JURY DEMAND

DEMAND FOR ANSWERS  
TO INTERROGATORIES

Plaintiff, SEAN J. McCALL, residing on Cleveland Avenue, in the City of Trenton, County of Mercer, and State of New Jersey, by way of Complaint, says:

FIRST COUNT

1. On or about April 19, 2010, Plaintiff, SEAN J. McCALL, was a passenger in a motor vehicle owned and being operated by Defendant, MONTRESE LAVONNE-CARTER, on Southbound Interstate 295, at or near milepost 41.0, in the Township of Mount Laurel, County of Burlington, and State of New Jersey.

2. At or about the same time and place, Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC. and/or JOHN DOES 1-50 (fictitious designations), were the owners of a tractor trailer rig/cab and adjoining trailer (designated on the police report as MO Registration 14A325 and VIN 1JJV532BXAL354901) which was being operated by Defendant, JEFFREY

SCHOTTMULLER, as agent, servant, and/or employee of Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC. and/or JOHN DOES 1-50 (fictitious designations), and/or otherwise with the knowledge, consent and/or permission of Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC. and/or JOHN DOES 1-50 (fictitious designations), on Southbound Interstate 295, at or near milepost 41.0, in the Township of Mount Laurel, County of Burlington, and State of New Jersey.

3. At present, the identities of Defendants, JOHN DOES 1-50, is unknown. As such, "JOHN DOES 1-50", is a fictitious designation, representing one or more individuals, sole proprietorships, associations, limited partnerships, general partnerships, limited liability companies and/or corporations, which in any way owned, operated, insured, maintained, registered, controlled, entrusted, hired for, and/or trained for any motor vehicle(s), including tractor trailer rig/cab and adjoining trailer (*designated on the police report as MO Registration 14A325 and VIN 1JJV532BXAL354901*) which caused or contributed to cause of said accident and who are otherwise responsible, in whole or in part, for the injuries sustained by the Plaintiff, SEAN J. McCALL.

4. At all times material hereto, Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC., JEFFREY SCHOTTMULLER, MONTRESE LAVONNE-CARTER and/or JOHN DOES 1-50 (fictitious designations), so negligently owned, operated, maintained, insured, entrusted and/or hired for, their motor vehicle(s), so as to cause a collision.

5. As a direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC., JEFFREY SCHOTTMULLER, MONTRESE LAVONNE-CARTER and/or JOHN DOES 1-50 (fictitious designations), as aforesaid, and their disregard for the safety of others, Plaintiff, SEAN J. McCALL, was caused to suffer severe bodily injuries, some or all of which are permanent in nature; has been caused to aggravate any pre-existing medical condition, symptomatic and/or

asymptomatic, which is permanent; has been caused and will be caused great pain and suffering; has been caused and will be caused to expend large sums of money for medical treatment necessary to effect a cure for his injuries; and, has been caused and will be caused to lose large sums of money due to his inability to pursue his usual occupation.

WHEREFORE, Plaintiff, SEAN J. McCALL, demands Judgment for damages generally against the Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC., JEFFREY SCHOTTMULLER, MONTRESE LAVONNE-CARTER and JOHN DOES 1-50 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

STARK & STARK  
A Professional Corporation  
Attorneys for Plaintiff

By:   
CHRISTOPHER M. PYNE

JURY DEMAND

Plaintiff, SEAN J. McCALL, hereby demands a trial by jury as to all issues.

CERTIFICATION OF OTHER ACTIONS/PARTIES

Pursuant to the provisions of Rule 4:5-1, the undersigned attorney certifies that this matter is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.

CERTIFICATION OF COMPLIANCE WITH R.1:38-7(c)(1)

Pursuant to R. 1:38-7(b), all confidential identifiers of the parties to this action have or will be redacted from all documents or pleadings submitted to the court.

STARK & STARK  
A PROFESSIONAL CORPORATION  
ATTORNEYS AT LAW  
MAILING ADDRESS  
PO BOX 5315  
PRINCETON, NEW JERSEY 08543-5315

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4 the Court is advised that ANDREW M. SALMON is hereby designated as trial counsel.

DEMAND FOR ANSWERS TO INTERROGATORIES & SUPPLEMENTAL INTERROGATORIES

*Plaintiff, SEAN J. McCALL, demands that Defendants, NEW PRIME, INC. a/k/a and d/b/a PRIME, INC., JEFFREY SCHOTTMULLER and MONTRESE LAVONNE-CARTER, provide answers to interrogatories as follows:*

**FORM C and FORM C(1) UNIFORM INTERROGATORIES** as set forth in Appendix II of the New Jersey Court Rules effective September 1, 2006

**SUPPLEMENTAL INTERROGATORIES #1-10.**

STARK & STARK  
A Professional Corporation  
Attorneys for Plaintiff

By:   
CHRISTOPHER M. PYNE

Dated:

3/12/08

STARK & STARK  
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